

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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| MICHELLE McDONALD-WITHERSPOON, | : | |
| Individually and as Administratrix of the | : | CIVIL ACTION |
| ESTATE OF KENYADA JONES | : | |
| Plaintiff | : | NO. 17-CV-1914-TON |
| vs. | : | |
| CITY OF PHILADELPHIA; ET AL. | : | |
| Defendants | : | |

PLAINTIFF'S OPPOSITION TO MOTION FOR SUMMARY JUDGMENT
FILED BY DEFENDANTS CORIZON HEALTH & VIVIAN GANDY

Plaintiff, through the undersigned attorney, Cristal Law Firm LLC, by way of response to the Motion for Summary Judgment filed by the above defendants, hereby states that plaintiff opposes the motion in its entirety for the reasons set forth in the attached brief in opposition and the exhibits appended thereto. Also attached is a form of Order and certificate of service.

Wherefore, plaintiff requests that the attached order be entered denying the motion in its entirety for the foregoing reasons.

CRISTAL LAW FIRM LLC
By: /s/ Stephen Cristal
PA Atty. ID #95020, NJ Atty ID#032841995
100 Springdale Road, Suite A3-223, Cherry Hill NJ 08003
Phone: (215) 917-0602, Fax: 215-914-6353, Email: cristallawfirm@aol.com
Attorneys for Plaintiff

Dated: July 30, 2019

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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| ESTATE OF KENYADA JONES | : | |
| Plaintiff | : | NO. 17-CV-1914-TON |
| vs. | : | |
| CITY OF PHILADELPHIA; ET AL. | : | ORDER DENYING |
| Defendants | : | SUMMARY JUDGMENT |

AND NOW, this _____ day of _____, 2019, upon
consideration of the Motion for Summary Judgment filed by defendants CORIZON HEALTH
AND VIVIAN GANDY, and the response in opposition filed by plaintiff, and the oral argument
if any, and for good cause shown, it is HEREBY ORDERED that the Motion is DENIED.

BY THE COURT:

U.S.D.J.